THE ROSEN LAW FIRM, P.A.

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[Proposed] Lead Counsel for Movant and Class

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JEEUN FRIEL, Individually and on behalf of all others similarly situated,

Plaintiff,

v.

DAPPER LABS, INC. AND ROHAM GHAREGOZLOU.,

Defendants.

CASE No.: 1:21-cv-05837-VM

NOTICE OF MOTION OF GARY LEUIS TO: (1) APPOINT LEAD PLAINTIFF; AND (2) APPROVE LEAD PLAINTIFF'S SELECTION OF COUNSEL

CLASS ACTION

PLEASE TAKE NOTICE that pursuant to Section 27 of the Securities Act of 1933 ("Securities Act"), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), Plaintiff Gary Leuis ("Movant") hereby moves this Court, the Honorable Victor Marrero, United States District Court Judge, on a date and at a time to be designated by the Court, for an order:

(a) appointing Movant to serve as Lead Plaintiff in this action; and

(b) approving Movant's selection of The Rosen Law Firm, P.A. as Lead Counsel for the litigation.

In support of this Motion, Movant submits: (i) the Memorandum of Law dated October 5, 2021 (and exhibits); and (ii) a [Proposed] Order Appointing Lead Plaintiff and Approving Lead Plaintiff's Selection of Counsel.

Dated: October 5, 2021 Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Phillip Kim
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[Proposed] Lead Counsel for Movant and Class

CERTIFICATE OF SERVICE

I hereby certify that on October 5, 2021, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Phillip Kim